

THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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BOU-MATIC, LLC, et al.,

Plaintiffs,

v.

19-CV-158-SLC

MICHAEL A. MILLS,

Defendant.

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**DEFENDANT'S MOTION TO DISMISS PLAINTIFFS' COMPLAINT**

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Defendant, Michael A. Mills, by Pines Bach LLP and Ahmad, Zavitsanos, Anaipakos, Alavi & Mensing, P.C., his attorneys, hereby respectfully moves the Court, pursuant to Rules 12(b)(1), 12(b)(2) & 12(b)(6) of the Federal Rules of Civil Procedure, respectively, for an order dismissing Plaintiffs' complaint on the grounds that: the Court lacks subject matter jurisdiction over all claims made in the complaint [12(b)(1)]; the Court lacks personal jurisdiction over the Defendant [12(b)(2)]; and the complaint fails to state a claim upon which relief can be granted [12 (b)(6)].

The grounds for this motion are more specifically set forth in Defendant's Memorandum of Law in Support of Motion to Dismiss and the Declarations of Michael A. Mills and Adam Milasincic which are filed herewith.

Respectfully submitted this 1<sup>st</sup> day of May, 2019.

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